

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

DEAN DUMMER, DENNIS E. SMITH, MODHI
GUDE, ARJI GAUTHAMI, CHRISTOPHER PEPIN,
KOUROSH ALIPOR, IRA A. TURRET SEP-IRA
DATED 01/24/02, PAUL BOSTROM, individually
and on behalf of all others similarly situated,

Plaintiffs,

vs.

VASO ACTIVE PHARMACEUTICALS, INC.,
JOHN J. MASIZ, JOSEPH FRATTAROLI and
STEPHEN G. CARTER,

Defendants.

2004 JUN -8 A 11:43
Civil Action No.: 04-cv-10708 RCL

U.S. DISTRICT COURT
DISTRICT OF MASS.

RICHARD SHAPIRO, Individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

VASO ACTIVE PHARMACEUTICALS, INC., JOHN
J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G.
CARTER,

Defendants.

Civil Action No.: 04-cv-10720 NG

CHRISTOPHER PEPIN, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

VASO ACTIVE PHARMACEUTICALS, INC., JOHN
J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G.
CARTER,

Defendants.

Civil Action No.: 04-cv-10763 RCL

[captions continued on the following page]

**MOTION OF BRUCE A. YUNGMAN AND RONNIE YOUNG TO BE
APPOINTED LEAD PLAINTIFF, AND FOR APPROVAL OF LEAD
PLAINTIFF'S SELECTION OF LEAD COUNSEL**

MODHI GUDE, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

VASO ACTIVE PHARMACEUTICALS, INC.,
JOHN J. MASIZ, JOSEPH FRATTAROLI and
STEPHEN G. CARTER,

Defendants.

Civil Action No.: 04-cv-10789 RCL

JOSEPH ROSENKRANTZ, Derivatively on behalf of
Vaso Active Pharmaceuticals,

Plaintiff,

vs.

BIOCHEMICS, INC. WILLIAM P. ADAMS,
ROBERT E. ANDERSON, STEPHEN G. CARTER,
GARY FROMM, JOHN J. MASIZ, KEVIN J.
SEIFERT, BRUCE A. SHEAR, BRIAN STRASNICK,
VASO ACTIVE PHARMACEUTICALS, INC.

Defendants.

Civil Action No.: 04-cv-10792 RCL

KIM & JOSEPH BENEDETTO, Individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

VASO ACTIVE PHARMACEUTICALS, INC., JOHN
J. MASIZ and JOSEPH FRATTAROLI,

Defendants.

Civil Action No.: 04-cv-10763 RCL

[Captions continued on the following page]

<p>DEAN DUMMER, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No.: 04-cv-10819 NG</p>
<p>EDWARD A. TOVREA, Individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No.: 04-cv-10851 RCL</p>
<p>KOUROSH ALIPOR, on behalf of himself and all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No.: 04-cv-10877 RCL</p>
<p>[captions continued on the following page]</p>	

<p>PAUL BOSTROM, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ and JOSEPH FRATTAROLI</p> <p style="text-align: right;">Defendants.</p>	Civil Action No.: 04-cv-10948 RCL
<p>IRA A. TURRET SEP-IRA DATED 01/24/02, PAUL BOSTROM, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,</p> <p style="text-align: right;">Defendants.</p>	Civil Action No.: 04-cv-10980 RCL
<p>JAMES KARANFILIAN, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,</p> <p style="text-align: right;">Defendants.</p>	Civil Action No.: 04-cv-10877 RCL

**MOTION OF BRUCE A. YUNGMAN AND RONNIE YOUNG TO BE
APPOINTED LEAD PLAINTIFFS, AND FOR APPROVAL OF LEAD
PLAINTIFFS' SELECTION OF LEAD COUNSEL**

Vaso Active Pharmaceuticals, Inc. securities investors Bruce A. Yungman and Ronnie Young (the "Proposed Lead Plaintiffs" or "Movants") hereby move this Court pursuant to Section 21D of the Securities Exchange Act of 1934 (the "Exchange Act"), as amended by the Private

Securities Litigation Reform Act of 1995 ("PSLRA") for an order that:

- a. appoints Bruce A. Yungman and Ronnie Young as Lead Plaintiffs for the above-captioned related actions; and
- b. approves Wolf Haldenstein Adler Freeman & Herz LLP Lead Counsel for the Class.

This Motion is supported by the accompanying Memorandum of Law, the accompanying Declaration of Fred Taylor Isquith, Esq., and the exhibits annexed thereto, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: June 7, 2004

Respectfully submitted,

LAW OFFICES OF BRUCE G. MURPHY

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